

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

ADRIENNE RICHARDS et al.,	)	
	)	
Plaintiffs/Counter Defendants,	)	
	)	
v.	)	
	)	Civil Action No. 20-CV-347
	)	
TITLEMAX OF VIRGINIA, et al.,	)	
	)	
Defendants/Counter Claimants.	)	

**PLAINTIFF BRITTNEY COOKE’S OPPOSITION TO MOTION FOR LEAVE  
TO FILE RESPONSE IN OPPOSITION TO SHOW CAUSE**

NOW COME PLAINTIFF Brittney Cooke, through their counsel, and respectfully and respectfully submit this Opposition to Motion for Leave to File Response in Opposition to Show Cause.

**ARGUMENT**

TitleMax continues to argue with the American Arbitration Association, rather than do what needs to be done to have the matter heard on the merits. (See attached Exhibit A). As a result, Ms. Cooke is unable to have her matter heard. The only solution, given the repeated conduct and delays by TitleMax, is to enter Judgment for Ms. Cooke. TitleMax ought not be rewarded for these delays and forum shopping fencing as outlined in the motion.

TitleMax has now produced the payment history (Exhibit B—redactions in

documents done by TitleMax). The total payments are \$2,901.10. Further the value of the car taken was \$6,500 (Exhibit C). As such, the compensatory damages are \$9,401.10. The trebled amount is \$28,203.30. The Answer should be stricken only as to Ms. Cooke and Judgment ought be entered. A proposed judgment is attached as Exhibit D. Ms. Cooke is left with no other remedy then to seek this Judgment as a result of TitleMax's conduct.

This is the 9<sup>th</sup> day December, 2022.

/s/ Andrew H. Brown  
Andrew H. Brown  
N.C. State Bar No. 28450  
Attorney for Plaintiffs

**FOR THE FIRM:**

**BROWN, FAUCHER, PERALDO & BENSON, PLLC.**

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**CERTIFICATE OF WORD COUNT**

I hereby certify that the foregoing document complies with the word count limits contained in LR 7.3(d)(1).

/s/ Andrew H. Brown  
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